



Serving the Vending, OCS and Foodservice Management Industries

To: Appliance Program Staff
California Energy Commission
Sacramento, CA

From: Larry M. Eils, Senior Director, Technical Services, NAMA
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Date: November 18, 2004

Re: Docket No. 04-AAER-1
Multi-package Beverage Vending Machines

On October 29, 2004 the NAMA Energy Committee submitted comments to the Commission regarding the new category of beverage vending machines called multi-package vendors. We would like to thank the Commission for establishing this new category of vendor. However, we would like to submit a suggested definition change for multi-package vendors and stress the need for a separate energy efficiency formula for multi-package vendors.

Definition Revision

We would like to suggest the proposed definition be revised to read: "Refrigerated multi-package beverage vending machine means a refrigerated beverage vending machine that is able to dispense at least 20 discrete types of products." We would like the number of be reduced from 25 to 20 products since we have machines already in use at this level. We would also like the word "display" deleted for new designs are in development that will change the display configuration, thereby changing the design of the door but will still allow view of the beverages. We apologize for not submitting a suggested definition for this new category of vendor with our earlier comments.

Request for New Energy Efficiency Level

As the NAMA Energy Committee previously stated, a separate energy consumption formula based on the interior volume of the multi-package vendor is necessary. Multi-package vendors are unique for they have the ability to offer drinks in a variety of different packaging configurations. Refrigerators and freezers are similar in that they hold a variety of packaging sizes. Since their energy consumption level is based on volume (see Table A-7 in the Express Terms of Proposed Regulations 15-day Language), the NAMA Energy Committee also requests that the energy consumption of multi-package vendors be based on volume and not the number of 12 ounce cans which will not actually be merchandised in such a machine.

Energy Consumption Formula Proposal

As we mentioned in our October 29, 2004 correspondence, the NAMA Energy Committee developed a formula that can be used to determine the energy efficiency of multi-package vendors. It is important everyone on the NAMA Energy Committee has the opportunity to submit their final comments but scheduling difficulties have delayed this process. We would appreciate it if you would allow us some additional time to compile our final comments in order to submit an energy efficiency formula all interested parties can agree on.

Therefore, based on the above information, the NAMA Energy Committee would like to propose a revision with regards to the definition of multi-package beverage vending machines and to allow further discussion for a new energy consumption formula for multi-package beverage vending machines. We look forward to hearing from the Commission concerning these matters.

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